

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# Hydro Bauxite & Alumina

CERTIFICATE NUMBER

29

ASI STANDARD

CHAIN OF CUSTODY  
(V2 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED AUDITING  
FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

1 APRIL 2025

DATE OF EXPIRY

31 MARCH 2028

CERTIFIED SINCE

29 MAY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Hydro Bauxite & Alumina including  
the Paragominas Bauxite Mine  
(Brazil), Alunorte Alumina Refinery  
(Brazil), NHB Belém Office (Brazil),  
Bauxite & Alumina Commercial  
Office (Switzerland) and the  
Corporate Office (Norway).

# AUDIT REPORT

## CHAIN OF CUSTODY

### STANDARD

#### OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Bauxite & Alumina
CERTIFICATION SCOPE	Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), Alunorte Alumina Refinery (Brazil), NHB Belém Office (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and the Corporate Office (Norway).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li></ul>
ASI STANDARD	Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit (26 – 29 November, 7 February 2019 and 15 March 2019)</li><li>• Surveillance Audit (15 October – 13 November 2020)</li><li>• Re-Certification Audit (14 – 18 February 2022)</li><li>• Re-Certification Audit and Scope Change (18 November – 11 December 2024)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 26 – 29 November, 7 February 2019 and 15 March 2019 (Certification Audit)</li><li>• 15 October – 13 November 2020 (Surveillance Audit)</li><li>• 14 – 18 February 2022 (Re-Certification Audit)</li><li>• 18 November – 11 December 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 24 April 2019 (Certification Audit)</li><li>• 21 January 2021 (Surveillance Audit)</li><li>• 27 May 2022 (Re-Certification Audit)</li><li>• 10 February 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Certification Audit (26 – 29 November 2018)</u></p> <p>The Audit Scope covered Hydro Bauxite &amp; Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (15 October 2020 – 12 November 2020)</u></p> <p>The Audit Scope covered Hydro Bauxite &amp; Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).</p>

---

The supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (October - November 2020), access to facilities for all audit personnel was not possible, due to COVID-19 related travel restrictions. The Paragominas and Alunorte production sites in Brazil included an onsite audit component, whilst the Corporate Office in Norway was audited as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Re-Certification Audit (14 – 18 February 2022)

The Audit Scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).

The supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

The Audit has been undertaken as a combined 'desktop' and on-site exercise consistent with the Entity's overall maturity level, Audit type and previous conformance ratings.

Re-Certification Audit and Scope Change (18 November – 11 December 2024)

The Audit Scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), Alunorte Alumina Refinery (Brazil), NHB Belém Office (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and the Corporate Office (Norway).

The supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

---

AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	1 April 2025 – 31 March 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	30 September 2026

---



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

---

## ENTITY OVERVIEW

Hydro Bauxite and Alumina (the 'Entity') is owned by Norwegian-based Hydro and is located within the municipalities of Barcarena and Paragominas, in the state of Pará, Brazil. The Entity commenced operations in 2007 with a Bauxite Mine that had a nominal production capacity of 9.9 million tonnes of Bauxite per year, however has now reached an annual production of 11.4 million tonnes. The Entity currently employs approximately 1,700 direct employees and 1,200 contractors. The Bauxite ore extracted is transported via a 244 kilometre pipeline to the Alunorte facility in Barcarena, where it is processed into Alumina.

The Hydro Alunorte refinery is considered the largest Alumina refinery in the world outside of China. It commenced production in 1995 and has a nominal production capacity of 6.3 million tonnes of Alumina per annum. The refinery currently employs approximately 2,200 people. The Alumina produced is destined both for export and to supply the Albras Aluminium Smelter, also located in Barcarena, which produces Aluminium ingots.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	OVERALL
<b>SYSTEMS</b>	High
<b>RISKS</b>	High
<b>PERFORMANCE</b>	High
<b>OVERALL</b>	<b>HIGH</b>

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. MANAGEMENT SYSTEM AND RESPONSIBILITIES</b>		
1.1 ASI Membership	Conformance	The Entity is an ASI Member, under the Production and Transformation membership class, committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The Entity is in the Bauxite Mining and Alumina Refining category and has held certification to the ASI Performance Standard and ASI Chain of Custody Standard since 2019. <a href="https://aluminium-stewardship.org/about-asi/members/Hydro">https://aluminium-stewardship.org/about-asi/members/Hydro</a>
1.2 CoC Management System	Conformance	The Entity has implemented a Management System that addresses all applicable requirements of the ASI Chain of Custody (CoC) Standard. The procedure describes the objectives, governance model, scope, responsibilities and handling of ASI CoC Materials and Non-CoC Materials, including calculation methods for the Material Accounting System. Hydro has an integrated supply chain and has direct control of facilities from Bauxite Mine and Alumina production (the Entity) to Casting and Downstream processes.
1.3 CoC Management System Monitoring	Conformance	The Entity conducts periodic reviews of its ASI CoC Management System, including monthly checks of the quantities of CoC Material and Non-CoC Material, as well as senior management reviews on an annual basis. Periodic reviews and updates are defined by the operational procedure.
1.4 Management Representative	Conformance	The Entity has nominated a senior Management Representative as having the overall responsibility for the ASI Chain of Custody Standard. The Entity has also identified a cross-functional operational team who is responsible for the operational implementation of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has developed and implemented communication and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody Standard. Adequate training is provided to the Entity's CoC operational team.
1.6 Records Management	Conformance	The Entity maintains up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard. The Entity's standard operating procedure defines a record retention time of five years.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has established a procedure that defines how to report information to ASI, including the reporting form to be used with all the required information.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity as its activities relate to Bauxite extraction and Alumina production, and no Scrap is generated.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has an established CoC Material management procedure to define how to report information as required. The Entity's report form includes all required information, and the annual report on the

CRITERION	RATING	COMMENT
		use of ASI Aluminium has been designed to report to the ASI Secretariat.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity's operating procedure specifies that the Entity will report any Positive Balance to the ASI Secretariat in time to meet the deadline of 30 June of the year following the end of each calendar year.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity's operating procedure specifies that the Entity shall report the Positive Balance used, if any, to the ASI Secretariat in time to meet the deadline of 30 June of the year following the end of each calendar year.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has an established CoC Material management procedure to define how to report information as required under the ASI CoC Standard. The annual report on the use of ASI Aluminium, including any Positive Balance used, has been designed to report to the ASI Secretariat.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity's operating procedure specifies that the Entity shall report quantities of CoC Material/s transferred between supply chain activities within the CoC Certified Entity (Intra-Entity flows) over the calendar year to the ASI Secretariat in time to meet the deadline of 30 June of the year following the end of each calendar year.

## 2. OUTSOURCING CONTRACTORS

2.1 Certification Scope	Not Applicable	The Criterion is not applicable as the Entity does not engage Outsourcing Contractors.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	The Criterion is not applicable as the Entity does not engage Outsourcing Contractors.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	The Criterion is not applicable as the Entity does not engage Outsourcing Contractors.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	The Criterion is not applicable as the Entity does not engage Outsourcing Contractors.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	The Criterion is not applicable as the Entity does not engage Outsourcing Contractors.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	The Criterion is not applicable as the Entity does not engage Outsourcing Contractors.
2.5 Error (Outsourcing Contractor)	Not Applicable	The Criterion is not applicable as the Entity does not engage Outsourcing Contractors.

## 3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM

CRITERION	RATING	COMMENT
3.1a ASI Bauxite (CoC Certification Scope)	Conformance	The Entity's Bauxite Mining site (Paragominas) is included in the Entity's ASI Chain of Custody Standard Certification Scope. The Entity maintains robust controls in its Material Accounting System to handle ASI Bauxite and Non-ASI Bauxite Material.
3.1b ASI Bauxite (Performance Standard)	Conformance	The Entity is engaged in Bauxite Mining and holds both ASI Performance Standard (Certificate #24) and Chain of Custody Standard Certification.
3.1c ASI Bauxite (Bauxite sourcing)	Conformance	The Entity has systems in place to ensure that ASI Bauxite is only sourced from ASI Certified Bauxite Mines.
3.2a ASI Alumina (CoC Certification Scope)	Conformance	Alumina is produced at the Entity's Barcarena site, which is included in the Entity's ASI Chain of Custody Standard Certification Scope.
3.2b ASI Alumina (Performance Standard)	Conformance	The Entity is engaged in Alumina Refining and holds an ASI Performance Standard Certification (Certificate #24).
3.2c ASI Alumina (Bauxite sourcing)	Conformance	The Entity has systems in place to ensure that refined Alumina is only processed at the Barcarena site, which is certified against the ASI Performance Standard.
3.3a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3c ASI Aluminium (Alumina sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP</b>		
4.1a Recycled Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b Recycled Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2a Eligible Scrap (Pre-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Eligible Scrap (Post-Consumer)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2c Eligible Scrap (Dross)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
5.1a ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1c ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Unique Identification	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM</b>		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL</b>		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues, including Corruption and a framework for a responsible supply chain, available at: <a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a>
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues and a framework for a responsible supply chain, available at: <a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a>
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity has established a Supplier Code of Conduct addressing Human Rights Due Diligence. The Code is mandatorily signed by Suppliers and a Due Diligence risk assessment is undertaken prior to commencing business with the Entity.  The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues and a framework for a responsible supply chain, available at:

CRITERION	RATING	COMMENT
		<a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a>
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Conformance	<p>The Entity has established a Supplier Responsible Sourcing framework including assessment of Conflict Affected and High-Risk Areas (CAHRA). The Supplier Code of Conduct is mandatorily signed by Suppliers and a Due Diligence risk assessment is undertaken prior to commencing business with the Entity.</p> <p>The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues, available at: <a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a></p>
7.2 Risk Assessment and Mitigation	Conformance	The Entity has established a Supplier Code of Conduct including a Risk Assessment and qualification process. The Code is mandatorily signed by Suppliers and a Due Diligence risk assessment is undertaken prior to commencing any business activity with the Entity.
7.3 Complaints Resolution Mechanism	Conformance	<p>The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. This is accessible through a link on the Entity's website and other local means.</p> <p>The Entity provides a communication channel with external parties including Communities, which is available on the Entity's website. During the Audit, five community leaders were interviewed who demonstrated a good level of communication and partnership with the Entity, confirming the knowledge and availability of the Direct Channel at: <a href="https://www.hydro.com/pt-BR/fale-conosco/canal-direto">https://www.hydro.com/pt-BR/fale-conosco/canal-direto</a></p> <p>The assessment of the effectiveness of the Direct Channel is publicly available in the Integrated Annual Report 2023, page 157: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</a></p>
<b>8. MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM</b>		
8.1 Material Accounting System	Conformance	The Entity has developed and implemented a Mass Balance process that provides Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass for each of the Aluminium value chain elements included in the Entity's CoC Certification Scope.
8.2 Material Accounting Period	Conformance	The Entity has demonstrated it will use a 12-month rolling period. This is stated in the Volume Control Table that has been developed for the implementation of the ASI Chain of Custody Standard.
8.3 Input and Inflow Quantities	Conformance	The Entity has established a procedure which defines that in each Material Accounting Period, the quantities of CoC Material, Eligible Scrap Input, Non-CoC Material and Recyclable Scrap Material Inflow to the Certification Scope are to be recorded.
8.4 Output Quantities of CoC Material	Conformance	The Entity has a Mass Balance process that provides Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass

CRITERION	RATING	COMMENT
		for each of the Aluminium value chain elements included in the Entity's CoC Certification Scope.
8.5 Indivisibility of CoC Material	Conformance	The Entity's Output Quantity of CoC Material is designated as 100%. The Material Accounting System is designed to control this aspect and necessary training has been provided to relevant employees.
8.6 Output Quantity of Eligible Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System and internal control mechanisms assure that Outputs do not exceed Inputs.
8.8a Internal Overdraw (Not exceed 20%)	Conformance	The Entity has established procedures and systems to control the Material Accounting Period and make sure Internal Overdraws do not exceed 20%.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Material Accounting System and internal control mechanisms assure the Internal Overdraw does not exceed the amount of CoC Material affected by a Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's Material Accounting System and internal control mechanisms assure the Internal Overdraw is made up within the subsequent Material Accounting Period.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Material Accounting System and internal control mechanisms assures a Positive Balance is carried over to the subsequent Material Accounting Period.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Material Accounting System and internal control mechanisms assures that a Positive Balance carried over to the subsequent Material Accounting Period will expire at the end of that period if not drawn.
<b>9. ISSUING COC DOCUMENTS</b>		
9.1 CoC Document	Conformance	A CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities (no Outsourcing Contractors are used). The Entity includes CoC information in the accompanying invoice to CoC Certified Entities.
9.2a CoC Document Content (Date of issue)	Conformance	A CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities (no Outsourcing Contractors are used) and includes the date of issue. The Entity includes CoC information in the accompanying invoice to CoC Certified Entities.
9.2b CoC Document Content (Reference number)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information including a reference number and material code.

CRITERION	RATING	COMMENT
9.2c CoC Document Content (issuing Entity)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the issuing Entity.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the receiving customer.
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the issuing Entity and the responsible employees who can verify information in the CoC Document.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material which includes a statement of conformance related to the ASI Chain of Custody Standard.
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the type of CoC Material shipped.
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC material with information on the mass of CoC Material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity has developed documents and records to follow shipments and transfer of CoC Material with information on the mass of total material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Not Applicable	This Criterion is not applicable as the Entity does not intend to publish Sustainability Data within CoC Documentation.
9.3b Sustainability Data (optional) - Origin information	Not Applicable	This Criterion is not applicable as the Entity does not intend to publish Sustainability Data within CoC Documentation.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional) - Objective evidence	Not Applicable	This Criterion is not applicable to the Entity as it is not planning to provide Supplementary Information.
9.5 Verification of Information	Conformance	The Entity has defined the process and responsibility for verification of information in a documented procedure, to enable it to respond to requests for verification of information in CoC Documents issued by the Entity.

CRITERION	RATING	COMMENT
9.6 Error (Shipping)	Conformance	The Entity has assigned responsibilities for error handling and has implemented documented processes, which specify the way in which errors regarding CoC Material shipments shall be handled (e.g. documentation of the error, root cause analysis, communication, improvement actions to avoid recurrence).
<b>10. RECEIVING CoC DOCUMENTS</b>		
10.1 Verification of CoC Documents	Conformance	The Entity has a management system procedure and established routines to regularly check and verify received CoC Documents.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has implemented a management system procedure and established routines to regularly check the consistency of CoC Documents before recording information in the Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has implemented a management system procedure and established routines to regularly check the ASI website to verify validity and scope of supplier's ASI CoC Certification Status.
10.4 Error (Reception)	Conformance	The Entity has designed verification steps to review the consistency of received CoC Documents as required by the ASI CoC Standard. Relevant employees have been trained accordingly.
<b>11. CLAIMS AND COMMUNICATIONS</b>		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has defined in its ASI CoC (Mass Balance) Management System that all claims and communications must follow the ASI Claims Guide, including any communications with the ASI Secretariat. The Entity's Management Representative is responsible for this matter.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has established that verifiable evidence shall be prepared to support representations or statements stipulated in its CoC Material Balance Management Procedure.
11.1c Claims and Communications (Employee training)	Conformance	The Entity intends to make claims and communications about the CoC Material outside of the CoC Documents. The Entity is preparing all necessary documentation, procedures and training programs in accordance with the established Chain of Custody Management System Manual in accordance with the ASI CoC Claims Guidelines.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 May 2019	Issued (Full Certification)
1	1 February 2021	Surveillance Audit
2	10 June 2021	Correction to Public Headline Statement for Criteria in Section 11
3	15 June 2022	Re-Certification Audit
4	1 April 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply Performance Standard v3; Scope Change to include Bauxite & Alumina Commercial Office (Switzerland) and NHB, Belém (Brazil).

---